



## Davis Wright Tremaine LLP

ANCHORAGE BELLEVUE LOS ANGELES NEW YORK PORTLAND SAN FRANCISCO SEATTLE SHANGHAI WASHINGTON, D.C.

JAMES M. SMITH  
DIRECT (202) 508-6688  
jamesmsmith@dwt.com

SUITE 450  
1500 K STREET NW  
WASHINGTON, D.C. 20005-1272

TEL (202) 508-6600  
FAX (202) 508-6699  
www.dwt.com

February 6, 2006

**By Electronic Filing**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: EB Docket No. 06-36  
EB-06-TC-060  
Certification of CPNI Filing  
February 3, 2006**

Dear Ms. Dortch:

On behalf of ACC Telecommunications of Virginia, LLC, attached herewith, in response to the Public Notice in the above-referenced matter (DA 06-223, rel. January 30, 2006), is its annual CPNI compliance certification pursuant to section 64.2009(e) of the Commission's Rules.

Kindly address any questions concerning this matter to the undersigned counsel.

Sincerely,

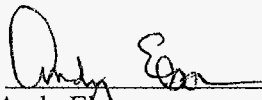
DAVIS WRIGHT TREMAINE LLP

James M. Smith  
Counsel for ACC Telecommunications  
of Virginia, LLC

cc: Byron McCoy  
Best Copy and Printing, Inc.

**CERTIFICATION PURSUANT TO 47 C.F.R. 64.2009(e)**

I hereby certify, on behalf of ACC Telecommunications of Virginia, LLC (the "Company"), that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with Part 64, Subpart U of the rules and regulations of the Federal Communications Commission regarding Customer Proprietary Network Information ("CPNI") (47 C.F.R. 64.2001 et seq.). Attached hereto is a statement that describes the Company's operating procedures to ensure that it is in compliance with these rules.

Signed: \_\_\_\_\_  
Andy Elson  
Vice President- Compliance

Dated: 2-3-06

## **STATEMENT OF CPNI OPERATING PROCEDURES**

1. It is the policy of ACC Telecommunications of Virginia, LLC (the “Company”) not to use, disclose, or permit access to Customer Proprietary Network Information (“CPNI”), as defined in the FCC’s rules, for any purpose other than the following, all of which are permitted under FCC rules without customer approval:

a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes;

b. For the purpose of providing inside wiring installation, maintenance, and repair services.

c. For the purpose of marketing “adjunct-to-basic” services, such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.

d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraudulent, abusive, or unlawful use of or subscription to such services.

2. The Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose other than those set forth above. The Company has an express disciplinary process in place to discipline violations of its CPNI policy.

3. Because the Company does not use, disclose, or permit access to CPNI except as described above, it does not maintain a record of its or affiliates' sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed or provided to third parties, or where third parties were allowed access to CPNI.

4. The Company has in place a supervisory review process regarding compliance with its CPNI policy.